REMARKS

This Application has been carefully reviewed in light of the Office Action mailed October 8, 2003. Claims 1-51 are pending in the Application. The Examiner rejected Claims 1-51. Claims 1, 13, 25-26, 33, 35-36, and 44 have been amended to further clarify what the Applicants believe to be the invention. Claims 5, 17, and 47 have been cancelled. As described below, Applicants believe all pending claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

Information Disclosure Statement (IDS)

Applicants submit an IDS with this Response for the Examiner's review and consideration. Applicants respectfully request that the Examiner formally indicate that the references were considered in the prosecution of the Application.

Section 102 Rejections

The Examiner rejects Claims 1-51 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,389,130 issued to Shenoda ("*Shenoda*").

Shenoda discloses a network operable to route telephone calls and other data over an asynchronous transfer mode (ATM) network. (*Shenoda*, Abstract). A system control hierarchy is established for routing the telephone calls using global routing tables which provide telephony number information to a signaling device used for routing the telephone calls over the ATM network. (*Shenoda*, Col. 6; Lines 39-46). An ATM cell header based on source and destination information includes a Virtual Path Identifier (VPI) and a Virtual Channel Identifier (VCI) which are used by switches within the ATM network to route telephone calls. (*Shenoda*, Col. 5; Lines 51-57).

Independent Claims 1, 13, 33, and 44 are Allowable over *Shenoda*

Claim 1, as amended, of the present invention recites the following:

> A method for call routing, comprising:
> receiving a call request at a first call manager from a first telephony device coupled to a packet-based network, the call request including a telephone number associated with a second telephony device;
> accessing a route list associated with the telephone number to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices; and
> communicating the call request to a second call manager controlling the gateway device included in the route list.

Claims 13, 33, and 44 recites similar, although not identical, limitations.

Claim 1 includes the limitations of cancelled Claim 5 and recites, in part, "accessing a route list associated with the telephone number to determine a port of a gateway device operable to transmit the call request to the second telephony device, wherein the route list comprises one or more route groups, each route group including a list of one or more ports of one or more gateway devices." Claims 13 (which includes the limitations of cancelled Claim 17), Claim 33, and Claim 44 (which includes the limitations of cancelled Claim 47) recite similar, although not identical, limitations.

The Examiner stated that *Shenoda* discloses the limitations of cancelled Claims 5, 17, and 47. (Office Action mailed 10/8/03, page 3, ¶4, citing *Shenoda*, Col. 5; Lines 32-38, 51-63, and Col. 6; Lines 39-52). *Shenoda* merely discloses that a multi-purpose switch uses source and destination information to establish a connection over an ATM network, where an ATM cell header can include VPI and VCI information used to route calls. (*Shenoda*, Col. 5; Lines 32-38, 51-63). At most, *Shenoda* discloses global routing tables (which the Examiner equates to a route list), system routing tables, and management routing tables. (*Shenoda*, FIGURE 4, Col. 6; Lines 39-46, 61-63). However, *Shenoda* fails to disclose a route list that comprises *one or more route groups, each route group including a list of one or more ports of one or more gateway devices*, as recited in amended Claim 1, and similarly,

although not identically, in amended Claims 13, 33, and 44. By way of example and without limitation, Applicants direct the Examiner's attention to the discussion of route lists and route groups in the present application with reference to FIGURES 6A and 6B on pages 31-33 of the "Detailed Description of the Invention."

In addition, Claim 13, as amended, recites a "route list control process associated with the telephone number and operable to..." Claim 44, as amended, recites similar, although not identical limitations. *Shenoda* fails to disclose a *route list control process*, as recited in amended Claim 13, and similarly, although not identically, in amended Claim 44.

For at least these reasons, amended Claims 1, 13, 33, and 44 are allowable over *Shenoda*. Therefore, Applicants respectfully request reconsideration and allowance of amended Claims 1, 13, 33, and 44, as well as all claims that depend from those claims.

Dependent Claims 2-4, 6-12, 14-16, 18-32, 34-43, 45-56, and 48-51 are Allowable over *Shenoda*

Dependent Claims 2-4, 6-12, 14-16, 18-32, 34-43, 45-56, and 48-51 depend from, and incorporate all of the limitations of, amended independent claims 1, 13, 33, or 44, which have been shown to be allowable for the reasons discussed above. Therefore, dependent Claims 2-4, 6-12, 14-16, 18-32, 34-43, 45-56, and 48-51 are allowable as they depend from allowable base claims. In addition to their dependence on allowable base claims, dependent Claims 3-4, 11, 15-16, 18, 23-24, 34-35, 37, 45-46, and 48 are allowable because they each contain limitations not disclosed in *Shenoda*, as described below.

Claims 3, 15, 34, and 45 are Allowable over *Shenoda*

Claim 3 recites, in part, "accessing a registration information table to determine a process identification (PID) of a route list control process." Claims 15, 34, and 45 recite similar, although not identical, limitations. The Examiner stated that *Shenoda* discloses this limitation. (Office Action mailed 10/8/03, page 3, ¶4, citing *Shenoda*, Col. 5; Lines 32-38, 51-63, and Col. 6; Lines 39-52). *Shenoda* merely discloses that a multi-purpose switch uses

source and destination information to establish a connection over an ATM network, where an ATM cell header can include VPI and VCI information used to route calls. (*Shenoda*, Col. 5; Lines 32-38, 51-63). However, *Shenoda* fails to disclose a process identification (PID) of a route control process, let alone accessing a registration information table to determine the PID, as recited in Claim 3, and similarly, although not identically, in Claims 15, 34, and 45.

For at least this additional reason, Claims 3, 15, 34, and 45 are allowable over *Shenoda*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 3, 15, 34, and 45.

Claims 4, 16, 35, and 46 are Allowable over *Shenoda*

Claim 4 recites, in part, accessing a route list to obtain the device name and a port number of the gateway device. Claims 16, 35, and 46 recite similar, although not identical, limitations. The Examiner stated that *Shenoda* discloses this limitation. (Office Action mailed 10/8/03, page 3, ¶ 4, citing *Shenoda*, Col. 5; Lines 32-38, 51-63, and Col. 6; Lines 39-52). *Shenoda* merely discloses that a multi-purpose switch uses source and destination information to establish a connection over an ATM network, where an ATM cell header can include VPI and VCI information used to route calls. (*Shenoda*, Col. 5; Lines 32-38, 51-63). However, *Shenoda* fails to disclose a route list containing a device name and a port number for a gateway device, let alone accessing a route list to obtain the device name and a port number of the gateway device.

For at least this additional reason, Claims 4, 16, 35, and 46 are allowable over *Shenoda*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 4, 16, 35, and 46, as well as all claims that depend from Claims 4, 16, 35, and 46.

Claims 6, 11, 18, 37, and 48 are Allowable over *Shenoda*

Claim 6 recites, in part, accessing a device name mapping table using the device manager to determine a PID of a first device process executed by the second call manager and controlling the gateway device. Claims 11, 18, 37, and 48 recite similar, although not

identical, limitations. The Examiner stated that *Shenoda* discloses this limitation. (Office Action mailed 10/8/03, page 3, ¶5, citing *Shenoda*, Col. 9-10; Lines 66-28). *Shenoda* merely discloses: (1) that permanent virtual connections (PVCs) can be maintained between multiple service modules and a system controller, (2) that an initial address message (IAM) is generated by a service switching point and used to determine a route for the call, and (3) a call manager uses a resource manager to determine an egress interface for the call. (*Shenoda*, Col. 9-10; Lines 66-1, 17-24). However, *Shenoda* fails to disclose a *device mapping table*, let alone accessing the device mapping table to determine a process identification of a first device process executed by a second call manager, as recited in Claim 6, and similarly, although not identically, in Claims 11, 18, 37, and 48.

For at least this additional reason, Claims 6, 11,18, 37, and 48 are allowable over *Shenoda*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 6, 11, 18, 37, and 48, as well as all claims that depend from Claims 6, 18, 37, and 48.

Claim 23 is Allowable over *Shenoda*

Claim 23 recites, in part, a device manager operable to receive a signal indicating that a new gateway device has registered with the call manager. The Examiner stated that *Shenoda* discloses this limitation. (Office Action mailed 10/8/03, page 3, ¶5, citing *Shenoda*, Col. 9-10; Lines 66-28). *Shenoda* merely discloses: (1) that permanent virtual connections (PVCs) can be maintained between multiple service modules and a system controller, (2) that an initial address message (IAM) is generated by a service switching point and used to determine a route for the call, and (3) a call manager uses a resource manager to determine an egress interface for the call. (*Shenoda*, Col. 9-10; Lines 66-1, 17-24). However, *Shenoda* fails to disclose a signal indicating that a new gateway device has registered with the call manager, as recited in Claim 23.

For at least this additional reason, Claims 23 is allowable over *Shenoda*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 23.

Claim 24 is Allowable over *Shenoda*

Claim 24 of the present invention recites:

> The call manager of Claim 18, wherein the device manager is further operable to:
>
> receive a signal indicating that a gateway device is no longer under the control of the call manager;
>
> delete the device name and associated PID of the gateway device from the device name mapping table; and
>
> communicate a deletion signal to the second call manager coupled to the packet-based network indicating that the device name and associated PID should be deleted from a device name mapping table of the second call manager.

The Examiner stated that *Shenoda* discloses these limitation. (Office Action mailed 10/8/03, page 3, ¶5, citing *Shenoda*, Col. 9-10; Lines 66-28). *Shenoda* merely discloses: (1) that permanent virtual connections (PVCs) can be maintained between multiple service modules and a system controller, (2) that an initial address message (IAM) is generated by a service switching point and used to determine a route for the call, and (3) a call manager uses a resource manager to determine an egress interface for the call. (*Shenoda*, Col. 9-10; Lines 66-1, 17-24). However, *Shenoda* fails to disclose: (1) a signal indicating that a gateway device is no longer under the control of the call manager, and (2) a deletion signal indicating that the device name and associated PID should be deleted from a device name mapping table of the second call manager, as disclosed in Claim 24. Furthermore, *Shenoda* fails to disclose a device manager operable to delete the device name and associated PID of the gateway device from the device mapping table, as recited in Claim 24.

For at least these additional reasons, Claims 24 is allowable over *Shenoda*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 24.

Claim 25 is Allowable over *Shenoda*

Claim 25 recites, in part, a device manager operable to receive a signal indicating that a third call manager has come on-line in the packet-based network. The Examiner stated that *Shenoda* discloses this limitation. (Office Action mailed 10/8/03, page 2, ¶2, citing *Shenoda*, Col. 6; Lines 39-46; Col. 10; Lines 11-28, 52-58). At best, *Shenoda* discloses global routing

tables and system routing tables that contain telephone information that can be used to route telephone calls. (*Shenoda*, Col. 6; Lines 39-46). Also, *Shenoda* merely discloses that an initial address message (IAM) is generated by a service switching point and used to determine a route for the call and that a call manager uses a resource manager to determine an egress interface for the call. (*Shenoda*, Col. 10; Lines 17-24). However, *Shenoda* fails to disclose a signal indicating that a third call manager has come on-line in the packet-based network, as recited in Claim 25.

For at least this additional reason, Claims 25 is allowable over *Shenoda*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 25.

Claim 26 is Allowable over *Shenoda*

Claim 26, as amended, recites, a device manager operable to receive a signal indicating that the second call manager has gone off-line and delete the device name and associated PID of the gateway devices controlled by the second call manager. The Examiner stated that *Shenoda* discloses this limitation. (Office Action mailed 10/8/03, page 4, ¶7, citing *Shenoda*, Col. 2; Lines 39-58). At best, *Shenoda* discloses that if a destination telephone is not coupled to a service switching point (SSP), the call information is routed to the appropriate SSP to relay the call. (Shenoda, Col. 2; Lines 47-49). However, *Shenoda* fails to disclose a signal indicating that a second call manager has gone-off line, as recited in Claim 26.

For at least this additional reason, Claims 26 is allowable over *Shenoda*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 26.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brian W. Oaks, Attorney for Applicants, at the Examiner's convenience at (214) 953-6986.

The required fee of $180.00 is submitted herewith for the IDS and is believed to be correct. However, if this is not correct the Commissioner is hereby authorized to charge additional fees or credit any overpayments to Deposit Account No. 02-0384 of Baker & Botts, L.L.P.

Respectfully submitted,

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